## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	) Case No. 17-22147-GLT
Ronald S. Jones,	j
Debtor,	) Chapter 11
Ronald S. Jones,	)
Movant,	) Related Document No. 269, 271
VS.	) Hearing Date: 05/01/23 @ 10:00 a.m
Freedom Mortgage Corporation,	j
Respondent.	) Document No.

## **JOINT STATUS REPORT**

**AND NOW** come Ronald S. Jones and Freedom Mortgage Company, jointly and through their respective counsel, and presents the following Status Report related to the pending Objection to Claim:

- 1. Ronald S. Jones (the "<u>Debtor</u>") filed an Objection to the Claim of Freedom Mortgage Company (the "<u>Objection</u>") on January 4, 2023. Doc. No. 269.
- 2. Freedom Mortgage Company filed its Response (the "Response") on February 6, 2023. Doc. No. 271.
  - 3. The Parties came to an agreement in principle on the amount of arrears.
- 4. However, when finalizing agreement, Freedom indicated that the escrow needed to be cured.
- 5. This remains an issue because previous correspondence indicated that there was a possibility of a positive escrow balance. It also materially changes the overall payment terms that the Debtor proposed.
- 6. The Debtor requested an escrow history to confirm whether there is a positive escrow balance on the Debtor's account.
  - 7. This request is outstanding.

It is so reported.

BY: /s/ Andrew Kevin Pratt

Andrew Kevin Pratt, PA Bar No. 328784 CALAIARO VALENCIK 938 Penn Avenue, Suite 501 Pittsburgh, PA 15222 (412) 232-0930 apratt@c-vlaw.com

Counsel for Ronald S. Jones

/s/ Mario Hanyon

Mario Hanyon, PA Bar No. 203993 BROCK & SCOTT PLLC 8757 Red Oak Boulevard, Suite 150 Charlotte, NC 28217 (844) 856-6646 PABKR@brockandscott.com

Counsel for Freedom Mortgage Company